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Jul 09 2024

CLERK U.S. DISTRICT COURT
DISTRICT OF ARIZONA

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

United States of America,
Plaintiff,

vs.

Michael Tomasi,
Defendant.

CR23-1751-PHX-DWL

I N F O R M A T I O N

**Count 1: 18 U.S.C. § 115(a)(1)(B)
(Threats Against Federal
Officials)**

**18 U.S.C. §§ 924(d) and 981,
21 U.S.C. §§ 853 and 881, and
28 U.S.C. § 2461(c)
(Forfeiture Allegation)**

THE UNITED STATES ATTORNEY'S OFFICE CHARGES:

COUNT 1

(Threat Against Federal Officials)

1. On or about August 26, 2023, in the District of Arizona and elsewhere, the defendant, MICHAEL TOMASI, did threaten to kill a federal law enforcement officer, to wit: Federal Bureau of Investigation Agents, with the intent to impede, intimidate, interfere, or retaliate against those federal law enforcement officers on account of the performance of their official duties by posting on www.patriots.win: "Shoot the FBI first and ask questions later. They are terrorists that deserve nothing but to be show on site. Fuck them all to death. Any FBI fag have a problem with that come to my house and see what happens. Shoot before they even pull their guns out of their trunk and you shoot to kill."

In violation of Title 18, United States Code, Section 115(a)(1)(B).

FORFEITURE ALLEGATION

(18 U.S.C. §§ 924(d) and 981;

21 U.S.C. §§ 853 and 881; 28 U.S.C. § 2461(c))

2. Pursuant to Title 18, United States Code, Sections 924(d) and 981, Title 21, United States Code, Sections 853 and 881, and Title 28, United States Code, Section 2461(c), and upon conviction of one or more of the offenses alleged in Count 1 of this Information, the defendant(s) shall forfeit to the United States of America all right, title, and interest in (a) any property constituting, or derived from, any proceeds the persons obtained, directly or indirectly, as the result of the offense, and (b) any property used, or intended to be used, in any manner or part, to commit, or to facilitate the commission of such offense, including, but not limited to the following property involved and used in the offense:

<u>FBI Item Number</u>	<u>Description</u>
1B1	Springfield armory XD-9 #XD825426
1B2	9mm round
1B3	Magazine containing 9mm ammunition
1B4	6 magazines containing 9mm ammunition
1B6	Smith & Wesson Model: M & P 15 Serial: TR88579
1B7	Magazine containing 223/5.56mm Rounds
1B9	3 Magazines with 223/5.56mm rounds
	3 Magazines with 9mm rounds
1B11	Ammunition Can marked 500 rounds of 5.56mm
1B12	Ammunition Can marked 500 rounds of 5.56mm
1B13	Ammunition Can marked 500 rounds of 5.56mm
1B14	Ammunition Can marked 500 rounds of 9mm
1B15	Ammunition Can marked 500 rounds of 9mm
1B16	Ammunition Can marked 500 rounds of 9mm
1B17	Ammunition Can marked 500 rounds of 9mm

1	1B18	Ammunition Can marked 500 rounds of 9mm
2	1B19	Ammunition Can marked 200 rounds of Buckshot
3	1B20	Ammunition Can marked 200 rounds of Buckshot
4	1B21	Ammunition Can marked 300 rounds of Birdshot
5	1B22	Ammunition Can unmarked containing 12 gauge ammunition
6	1B23	Ammunition Can unmarked containing 12 gauge, 223 and
7		270 win ammunition
8	1B24	Soft Case Shotgun Bag with shotgun rounds
9	1B26	Burnt Rifle
10	1B27	5 Magazines of AR-15 (2 with 30 rds and 4 with 40 rds of
11		ammunition)
12	1B28	Bag of shot gun ammunition, 1 Box of 9mm and 1 Box of
13		5.56mm
14	1B29	Remington 870 Tactical Serial: RS29649P
15	1B30	6 Federal OO Buck Shells from Item 10
16	1B31	3 Magazines loaded with 9mm ammunition

17 If any of the above-described forfeitable property, as a result of any act or omission
18 of the defendant(s):

19 (1) cannot be located upon the exercise of due diligence,
20 (2) has been transferred or sold to, or deposited with, a third party,
21 (3) has been placed beyond the jurisdiction of the court,
22 (4) has been substantially diminished in value, or
23 (5) has been commingled with other property which cannot be divided without
24 difficulty,
25 it is the intent of the United States to seek forfeiture of any other property of said
26 defendant(s) up to the value of the above-described forfeitable property, pursuant to Title
27 21, United States Code, Section 853(p).
28

1 All in accordance with Title 18, United States Code, Sections 924(d) and 981, Title
2 21, United States Code, Sections 853 and 881, Title 28, United States Code Section
3 2461(c), and Rule 32.2, Federal Rules of Criminal Procedure.

4 Dated this __ day of _____, 2024.

5 GARY M. RESTAINO
6 United States Attorney
7 District of Arizona



Digitally signed by RAYMOND WOO
Date: 2024.06.24 15:47:10 -0700

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